

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN
(Madison)**

KELORA SYSTEMS, LLC,

Plaintiff,

v.

TARGET CORPORATION, et al.,

Defendants.

Case No. 3:10-cv-00683-SLC

MOTION FOR *PRO HAC VICE* ADMISSION

Marlon E. Lutfiyya respectfully moves to appear *pro hac vice* in the above-captioned matter and states as follows:

1. I am an associate at the law firm Winston & Strawn LLP, counsel for Dell Inc. (“Dell”) in the above-captioned matter.

2. I have been a member in good standing of the bars of the State of New York and Illinois since January 2006 and May 2007, respectively. I am also a member in good standing of the bar of the U.S. District Court for the Northern District of Illinois. I have never been the subject of a disciplinary complaint in any jurisdiction.

3. Dell’s answer to the Complaint in this matter is currently due on December 20, 2010. I am filing this motion for the purpose of filing herewith Dell’s unopposed motion for an extension of time until January 24, 2011 to answer or otherwise respond to the Complaint. After filing this motion, I plan to apply for admission to practice before the District Court for the Western District of Wisconsin.

WHEREFORE, Marlon E. Lutfiyya respectfully requests that this Court grant his motion for *pro hac vice* admission in this matter.

Dated: December 16, 2010

Respectfully submitted

By: /s/ Marlon E. Lutfiyya

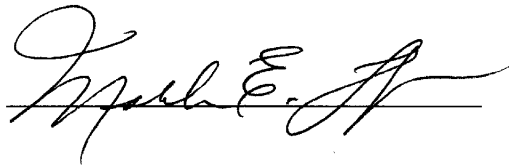
Marlon E. Lutfiyya
WINSTON & STRAWN LLP
35 W. Wacker Drive
Chicago, Illinois 60601-5600
Phone: (312) 558-5600
Fax: (312) 558-5700
kanderson@winston.com

Attorneys for Defendant Dell Inc.

CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2010, I electronically filed the foregoing Motion for *Pro Hac Vice* Admission with the Clerk of the Court using the Court's ECF system, which will send notification of such filing to all counsel of record.

Dated: December 16, 2010

A handwritten signature in black ink, appearing to read "Mark E. A.", is written over a horizontal line.